



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to establish the California  
Institute for Climate Solutions.

**FILED**  
Rulemaking 07-09-08  
(Filed September 20, 2007)  
03:04 PM

**COMMENTS OF THE GREENLINING INSTITUTE  
ON DRAFT PROPOSED DECISION ESTABLISHING CALIFORNIA INSTITUTE FOR  
CLIMATE SOLUTIONS**

ROBERT GNAIZDA  
SAMUEL KANG  
The Greenlining Institute  
1918 University Ave. 2<sup>nd</sup> Floor  
Berkeley, CA 94704  
Telephone: 510.926.4011  
Fax: 510.926.4010  
samuelk@greenlining.org

March 3, 2008

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to establish the California  
Institute for Climate Solutions.

Rulemaking 07-09-008  
(Filed September 20, 2007)

**COMMENTS OF THE GREENLINING INSTITUTE  
ON DRAFT PROPOSED DECISION ESTABLISHING CALIFORNIA INSTITUTE FOR  
CLIMATE SOLUTION**

**I. INTRODUCTION: CICS SHOULD SEEK PRIVATE MATCHING FUNDS AT 3:1**

The Greenlining Institute (Greenlining) offers the following Comments on the Draft Proposed Decision Establishing the California Institute for Climate Solutions (CICS).

Greenlining believes this Commission has made California a national leader in addressing global warming and climate change. This proceeding is only another example of how the CPUC is continuing its commitment to meet what President Mike Peevey calls “the defining environmental challenge of our time.” However, Greenlining disagrees that the Proposed Decision “adopts a bold and innovative approach” to meet this challenge.<sup>1</sup>

The Proposed Decision falls short of meeting this Commission’s own high standards of protecting and promoting the interests of California’s underserved. Due to the looming economic recession, the establishment of CICS in its proposed form will likely exacerbate the financial harm on California’s underserved communities. A CICS-imposed rate hike also forces ratepayers to pay for a venture that may not produce tangible benefits for California in the short or long term.

Therefore, Greenlining urges that the Proposed Decision be revised so that CICS is required to first attempt to secure private funding before squeezing ratepayers during a recession. Then, any subsequent use of \$600,000,000 in ratepayer funds should be predicated on obtaining

---

<sup>1</sup> Draft Proposed Decision at 2.

matching private funds at a 3:1 ratio (*i.e.* \$1.8 billion in private funds), which is consistent with the standard set forth in the California Emerging Technologies Fund. Finally, California's 22 million minorities should be utilized not only as a workforce, but as direct beneficiaries of CICS.

## **II. RATEPAYERS HIT WITH \$600,000,000 TAX ON BRINK OF RECESSION FOR “HIGHLY SPECULATIVE” PROJECT**

While the state is mired in a budget crisis and the economy is on the brink of a recession, CICS would impose an added tax on the utility bills of California's ratepayers. Reports are widespread that consumers should brace themselves for inflationary pressures on basic living expenses, including food, gas, and housing. Although this will create more pressure on public assistance programs to help California's low-income ratepayers, they will find little, if any, relief from public assistance programs. This is because Governor Schwarzenegger has repeatedly warned that vital public assistance to California's most vulnerable ratepayers may be severely reduced or even cut because of California's \$16 billion budget shortfall. Therefore, a CICS-imposed rate hike could not come at a worse time for California's low-income ratepayers.

### **A. Unanimous Concern Among Consumer Protection Groups**

All of the consumer protection organizations participating in this proceeding, including Consumer Federation of California, Division of Ratepayer Advocates and The Utility Reform Network, have urged this Commission to re-think the prudence of CICS in its current form because it will definitely result in higher utility bills for the next decade and “could result in unnecessary ratepayer and taxpayer expenditures.”<sup>2</sup> The prospect of “unnecessary ratepayer and taxpayer expenditures” is especially worrisome since the Proposed Decision admittedly “cannot precisely determine the potential return for ratepayers.”<sup>3</sup> The Proposed Decision underscores

---

<sup>2</sup> *Id.* at 8.

<sup>3</sup> *Id.* at 11.

that quantifying benefits for ratepayers is “highly speculative.”<sup>4</sup> Even UC’s own Director of Policy, Wendy Streitz, emphasized that the proposed \$600 million in ratepayer funds would likely fail to yield even \$1 million in tangible returns through CICS.<sup>5</sup>

### **B. Secure Private Matching Funds at a Level Similar to CETF**

It should be noted that Greenlining concurs with the Proposed Decision that this Commission should not be paralyzed into “inaction.”<sup>6</sup> The Commission must continue to ride and build on the momentum of the environmental movement. However, while government and consumers are all forced to tighten their belts to unprecedented levels, forcing ratepayers to bear the burden of a “highly speculative” project may ultimately harm this Commission’s efforts to advance the environmental movement. Therefore, Greenlining urges this Commission to minimize ratepayer risk in this venture by first requiring CICS to attempt to secure investments from private sources before the imposition of a rate hike.

If the imposition of a rate hike is unavoidable, Greenlining suggests requiring CICS to secure private matching grants at a 3:1 ratio (\$1.8 billion), which is consistent with the standards set forth by the California Emerging Technologies Fund (CETF),<sup>7</sup> prior to any expenditure of ratepayer-derived funds. Since CETF deems this 3:1 ratio as an attainable goal for even modest non-profit organizations, obtaining such grants for the University of California (UC), one of the largest and most prominent research institutions in the world, should also be an attainable goal. Expecting UC to first secure matching funds would be a more prudent approach to both

---

<sup>4</sup> *Id.* at 10.

<sup>5</sup> Streitz, Wendy, “Intellectual Property and the California Institute for Climate Solutions,” Presentation of Policy, Analysis & Campus Services of the Office of Technology Transfer, University of California at CICS Workshop, December 12, 2007. According to Ms. Streitz, “Universities, on average, create one invention for every \$2.5M of research funding...If every penny of CPUC’s \$600M were spent on research we’d expect about 240 inventions. A two decade study of UC inventions shows that only 1 in 400 inventions brings in over \$1M over its entire life.”

<sup>6</sup> Draft Proposed Decision at 16.

<sup>7</sup> <http://www.cetfund.org/Investments/Overview.aspx>

protecting and advancing the interests of ratepayers with the looming prospect of increased taxes. This approach would also be consistent with the Proposed Decision's assessment that "ratepayer benefit, in terms of dollar-for-dollar return on investment, will only be bolstered by the Institute's commitment to collect additional funding from private sources."<sup>8</sup>

If CICS is unable to secure private matching funds at a 3:1 ratio, then this Commission should consider whether to suspend the ratepayer-derived funding of CICS. The Proposed Decision gives itself the authority to exercise that right by stating that the "Decision may be modified by the Commission at any time."<sup>9</sup>

### **III. CICS MUST DO MORE TO MEET THE STANDARDS SET BY THIS COMMISSION TO PROTECT AND PROMOTE THE NEEDS OF THE UNDERSERVED**

One of the main reasons why this Commission has been able to lead the fight against global warming and climate change derives from its unrelenting commitment to protect the underserved. A "bold and innovative approach" to combating global warming and climate change would harness this commitment while capitalizing on the environmental movement. Therefore a final decision in this proceeding must thus do more to address the roles and benefits underserved communities will have under CICS.

#### **A. UC's Failure to Meet the Needs of California's Underserved Still at Issue**

Greenlining highlights the Proposed Decision's assessment of why CICS must be more inclusive for California's 22 million minorities:

"Greenlining contends that since ratepayer money is drawn from all segments of society, the Commission must ensure that the benefits are realized by all segments of society, including low-

---

<sup>8</sup> Draft Proposed Decision at 12.

<sup>9</sup> *Id.* at 4.

income and minority communities. Greenlining further argues that UC has historically been ineffective at reaching diverse and disadvantaged communities.”<sup>10</sup>

Despite Greenlining’s urging that UC revise its proposal so that it is truly aimed at all Californians, UC has only responded that issues of diversity are “*entirely irrelevant* to this proceeding.”(emphasis added)<sup>11</sup> UC’s disturbingly obtuse attitude towards diversity and the resulting failure to create an inclusive proposal that benefits all Californians is reflective of UC’s system-wide failure to represent the diversity of California. Moreover, UC’s conclusion that diversity is “entirely irrelevant to this proceeding” is entirely antithetical to this Commission’s leadership to meet the needs of the underserved.

#### **B. GO-156 Should Apply to CICS**

The Proposed Decision also misses the opportunity to capitalize on this Commission’s own leadership on supplier diversity. While making no mention of General Order 156, which helped Pacific Gas and Electric become one of the leading corporations on supplier diversity, the Proposed Decision expects CICS grantees to purchase only generally from California suppliers.<sup>12</sup>

Women, Minority, and Disabled Business Enterprises (WMDBE) are one of the fastest growing business sectors in California. This Commission has been a vanguard in reaching out to this group of business owners with GO-156. There is no reason why this order should not apply in this instance, with \$600,000,000 in ratepayer funds at stake. Therefore, a final decision should incorporate the standards and principles of GO-156 to encourage all grantees to purchase from suppliers who are not only California-based, but also reflect the population of California. That

---

<sup>10</sup> *Id.* at 15.

<sup>11</sup> UC Reply Comments to PUC: Rulemaking 07-09-008 at 5.

<sup>12</sup> Draft Proposed Decision at 38.

is, CICS grantees should be strongly encouraged to purchase from minority-, women- and disabled-owned businesses.

### **C. CICS Must Invest in Underserved Communities to Take Ownership**

The only substantive mentioning of diverse, underserved and low-income communities in the Proposed Decision was in the section detailing work opportunities. The Decision envisions CICS “providing job training to Californians, especially those from low-income, minority, and disadvantaged communities.”<sup>13</sup> Greenlining recognizes the Proposed Decision’s efforts to at least be inclusive of underserved communities in CICS’ impact on workforce development and job training. However, Greenlining is concerned that minorities are structured within the scope of this Decision only as tools for the Green movement rather than as beneficiaries.

While workforce development and job training should focus on meeting the employment needs of underserved communities, the involvement of these communities should not be restricted to tools for labor. A sustainable movement to fight climate change depends on the willing participation of ordinary citizens, not just the wealthy elite who install solar panels as a cheaper means to heat their pools and jacuzzies. Therefore, California’s 22 million minorities, constituting a majority of this state’s population, must be democratized as *direct beneficiaries* of CICS, not just as future installers of solar panels. One way this can be done is by promoting ownership of the environmental movement. For example, making the principles and standards of GO-156 directly applicable to CICS grantees would encourage more minority-owned businesses to own a stake in this Commission’s efforts to fight global warming.

---

<sup>13</sup> *Id.* at 41.

In its current form, the Proposed Decision misses this opportunity. A final decision should, thus, expand the role of low-income, minority and other underserved communities in taking ownership over opportunities that are presumed to result from CICS.

#### **IV. CONCLUSION**

CICS asks ratepayers to pay for the “benefit” of speculative prospects at a time when they can least afford to do so. Due to the unprecedented gap of this year’s state budget and the looming recession ahead, low-income ratepayers will be hit especially hard by the utility tax imposed by CICS.

Before expecting California’s most vulnerable ratepayers to bear the brunt of this tax, this Commission should require CICS to first obtain private sources of funding. If the expenditure of ratepayer-derived funding is unavoidable, CICS should first obtain matching private grants at a 3:1 ratio, which is consistent with the funding guidelines of CETF, before expending any ratepayer-derived funds. Furthermore, this Commission should also implement the standards and principles of GO-156 to invest in California’s underserved communities as owners of the environmental movement. Doing so will help alleviate some of the concern that CICS’ main impact on California’s minorities will be a short-term tax for the long-term profit of others.

This Commission has demonstrated the value and importance of diversity on a myriad of occasions in numerous proceedings. It is Greenlining’s hope that the CPUC will not miss this latest opportunity to once again demonstrate its commitment to diversity. By amalgamating this Commission’s dual commitments to diversity and environmentalism, CICS can redeem its potential to become an innovative vehicle benefiting all Californians.

Dated: March 3, 2008

Respectfully submitted,

/s/ Robert Gnaizda

Robert Gnaizda

The Greenlining Institute

/s/ Samuel S. Kang

Samuel S. Kang

The Greenlining Institute

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to establish the California  
Institute for Climate Solutions.

Rulemaking 07-09-008  
(Filed September 20, 2007)

**VERIFICATION**

I, Samuel Kang, am a representative of the Greenlining Institute and am authorized to make this verification on the organization's behalf. The statements in the forgoing document are true to the best of my knowledge, except for those matters that are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the forgoing is true and correct.

Executed this 3rd day of March, 2008, at Berkeley, CA.

/s/ Samuel Kang

---

Samuel Kang  
Legal Counsel  
Greenlining Institute  
1918 University Ave. 2<sup>nd</sup> floor  
Berkeley, CA 94704

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to establish the California  
Institute for Climate Solutions.

Rulemaking 07-09-008  
(Filed September 20, 2007)

**CERTIFICATE OF SERVICE**

I, Nancy Welch, am 18 years of age or older and a non-party to the within proceeding. I am a resident and citizen of the State of California with a business address at the Greenlining Institute, 1918 University Avenue, Second Floor, Berkeley, CA 94704 and telephone number 510-926-4001.

On March 3, 2008 I caused the following document:

**COMMENTS OF THE GREENLINING INSTITUTE  
ON DRAFT PROPOSED DECISION ESTABLISHING CALIFORNIA INSTITUTE FOR  
CLIMATE SOLUTION**

to be served upon all interested parties of record in R. 07-09-008 named in the official service list via e-mail to those whose e-mail address is listed in the official service list and via first class mail to those whose e-mail address is not available.

I certify that the foregoing is true and correct.

Executed in Berkeley, California March 3, 2008.

/s/ Nancy Welch

\_\_\_\_\_  
Nancy Welch

## Parties

DONALD GILLIGAN  
PRESIDENT  
NATIONAL ASSOCIATION OF ENERGY SERVICE  
610 MOUNTAIN STREET  
SHARON, MA 02067  
FOR: NAESCO

CHRISTOPHER HILEN  
ASSISTANT GENERAL COUNSEL  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD  
RENO, NV 89511  
FOR: SIERRA PACIFIC POWER COMPANY

NORMAN A. PEDERSEN  
ATTORNEY  
HANNA AND MORTON LLP  
444 SOUTH FLOWER ST. SUITE 1500  
LOS ANGELES, CA 90071-2916  
FOR: SOUTHERN CALIFORNIA GENERATION  
COALITION

DR. RANDOLPH W. HALL  
UNIVERSITY OF SOUTHERN CALIFORNIA  
300 BOVARD UNIVERSITY PARK CAMPUS  
LOS ANGELES, CA 90089-4019  
FOR: UNIVERSITY OF SOUTHERN CALIFORNIA

ELIZABETH L. AMBOS  
ASSISTANT VICE CHANCELLOR  
CALIFORNIA STATE UNIVERSITY  
401 GOLDEN SHORE  
LONG BEACH, CA 90802  
FOR: CALIFORNIA STATE UNIVERSITY

PROF. DAVID RUTLEDGE  
DIVISION CHAIR, ENGINEERING AND APP. SCI  
CALIFORNIA INSTITUTE OF TECHNOLOGY  
102 THOMAS, 104-44  
PASADENA, CA 91125  
FOR: CALIFORNIA INSTITUTE OF TECHNOLOGY

DANIEL W. DOUGLASS  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
21700 OXNARD STREET, SUITE 1030  
WOODLAND HILLS, CA 91367  
FOR: WESTERN POWER TRADING  
FORUM/ALLIANCE FOR RETAIL ENERGY MARKETS

AMBER E. DEAN  
SOUTHERN CALIFORNIA EDISON COMPANY  
LAW DEPARTMENT  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE, ROOM 370  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

HOWARD GOLLAY  
SOUTHERN CALIFORNIA EDISON  
2244 WALNUT GROVE AVE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON

LAURA GENAO  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
LAW DEPARTMENT  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

ALLEN K. TRIAL  
COUNSEL  
SAN DIEGO GAS & ELECTRIC COMPANY  
101 ASH STREET, HQ-12  
SAN DIEGO, CA 92101  
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

KIM HASSAN  
ATTORNEY AT LAW  
SEMPRA ENERGY  
101 ASH STREET, HQ12

SUSAN HACKWOOD  
EXECUTIVE DIRECTOR  
CALIFORNIA COUNCIL ON SCIENCE AND TECH  
5005 LA MART DRIVE, STE 105

SAN DIEGO, CA 92101  
FOR: SEMPRA ENERGY

RIVERSIDE, CA 92507  
FOR: CALIFORNIA COUNCIL ON SCIENCE AND  
TECHNOLOGY

TAM HUNT  
ENERGY PROGRAM DIRECTOR/ATTORNEY  
COMMUNITY ENVIRONMENTAL COUNCIL  
26 W. ANAPAMU, 2ND FLOOR  
SANTA BARBARA, CA 93101  
FOR: COMMUNITY ENVIRONMENTAL COUNCIL

ROBERT FINKELSTEIN  
ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102  
FOR: THE UTILITY REFORM NETWORK

MARION PELEO  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214  
FOR: DIVISION OF RATEPAYER ADVOCATES

DEVRA WANG  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
FOR: NATURAL RESOURCES DEFENSE COUNCIL

EVELYN KAHL  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104  
FOR: ENERGY PRODUCERS AND USERS  
COALITION, INDICATED PRODUCERS AND  
WESTERN STATES PETROLEUM ASSN.

BRIAN CRAGG  
ATTORNEY AT LAW  
GOODIN, MAC BRIDE, SQUERI, DAY & LAMPREY  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111  
FOR: INDEPENDENT ENERGY PRODUCERS  
ASSOCIATION

IRENE K. MOOSEN  
ATTORNEY AT LAW  
CITY AND COUNTY OF SAN FRANCISCO  
53 SANTA YNEZ AVENUE  
SAN FRANCISCO, CA 94112  
FOR: REGENTS OF THE UNIVERSITY OF  
CALIFORNIA

MICHAEL ALCANTAR  
ATTORNEY AT LAW  
ALCANTAR & KAHL LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94114  
FOR: ALCANTAR & KAHL LLP

CHRISTOPHER WARNER  
PACIFIC GAS AND ELECTRIC COMPANY  
LAW DEPARTMENT  
B30A, PO BOX 770000  
SAN FRANCISCO, CA 94177  
FOR: PACIFIC GAS AND ELECTRIC

JAMES L. SWEENEY  
DIR. PRECOURT INST. FOR ENERGY EFFICIENC  
STANFORD UNIVERSITY  
TERMAN ENGINEERING CENTER, ROOM 459  
380 PANAMA MALL  
STANFORD, CA 94305  
FOR: STANFORD UNIVERSITY

ANN M. ARVIN, MD  
VICE PROVOST AND DEAN OF RESEARCH  
STANFORD UNIVERSITY  
BUILDING 10, MAIN QUADRANGLE  
STANFORD, CA 94305-0977  
FOR: STANFORD UNIVERSITY

LARRY HORTON  
SENIOR V.P. FOR PUBLIC AFFAIRS  
STANFORD UNIVERSITY  
BUILDING 170, FIRST FLOOR  
STANFORD, CA 94305-2040  
FOR: STANFORD UNIVERSITY

ALEXIS K. WODTKE  
STAFF ATTORNEY  
CONSUMER FEDERATION OF CALIFORNIA  
520 S. EL CAMINO REAL, STE. 340  
SAN MATEO, CA 94402  
FOR: CONSUMER FEDERATION OF CALIFORNIA

PETER W. HANSCHEN  
ATTORNEY AT LAW  
MORRISON & FOERSTER LLP  
101 YGNACIO VALLEY ROAD, SUITE 450  
WALNUT CREEK, CA 94596  
FOR: MORRISON & FOERSTER LLP

LLOYD C. LEE  
ATTORNEY AT LAW  
UNIVERSITY OF CALIFORNIA GENERAL COUNSEL  
1111 FRANKLIN STREET 8TH FLOOR  
OAKLAND, CA 94607  
FOR: THE REGENTS OF THE UNIVERSITY OF CALIFORNIA

SAMUEL S. KANG  
LEGAL COUNSEL  
1918 UNIVERSITY AVE. 2ND FLOOR  
BERKELEY, CA 94704  
FOR: THE GREENLINING INSTITUTE

THALIA N.C. GONZALEZ  
ATTORNEY AT LAW  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, 2ND FLOOR  
BERKELEY, CA 94704  
FOR: THE GREENLINING INSTITUTE

EDWARD VINE  
LAWRENCE BERKELEY NATIONAL LABORATORY  
BUILDING 90R4000  
BERKELEY, CA 94720  
FOR: LAWRENCE BERKELEY NATIONAL LABORATORY

FRANK TENG  
ENVIRONMENT AND ENERGY ASSOCIATE  
SILICON VALLEY LEADERSHIP GROUP  
224 AIRPORT PARKWAY, SUITE 620  
SAN JOSE, CA 95110  
FOR: SILICON VALLEY LEADERSHIP GROUP

AUDRA HARTMANN  
DYNEGY INC.  
980 NINTH STREET, SUITE 2130  
SACRAMENTO, CA 95814  
FOR: DYNEGY, INC.

VIRGIL WELCH  
STAFF ATTORNEY  
ENVIRONMENTAL DEFENSE  
1107 9TH STREET, SUITE 540  
SACRAMENTO, CA 95814  
FOR: ENVIRONMENTAL DEFENSE

RONALD LIEBERT  
ATTORNEY AT LAW  
CALIFORNIA FARM BUREAU FEDERATION  
2300 RIVER PLAZA DRIVE  
SACRAMENTO, CA 95833  
FOR: CALIFORNIA FARM BUREAU FEDERATION

ANN L. TROWBRIDGE  
ATTORNEY AT LAW  
DAY CARTER MURPHY LLC  
3620 AMERICAN RIVER DRIVE, SUITE 205  
SACRAMENTO, CA 95864  
FOR: MERCED IRRIGATION DISTRICT AND MODESTO IRRIGATION DISTRICT

RYAN L. FLYNN  
PACIFICORP  
825 NE MULTNOMAH, 18TH FLOOR  
PORTLAND, OR 97232  
FOR: PACIFICORP

## Information Only

KEITH R. MCCREA  
ATTORNEY AT LAW

CYNTHIA A. FONNER  
SENIOR COUNSEL

SUTHERLAND, ASBILL & BRENNAN, LLP  
1275 PENNSYLVANIA AVE., N.W.  
WASHINGTON, DC 20004-2415  
FOR: CALIFORNIA MANUFACTURERS &  
TECHNOLOGY ASSOCIATION

GARY HINNERS  
RELIANT ENERGY, INC.  
PO BOX 148  
HOUSTON, TX 77001-0148

BRIAN MCQUOWN  
RELIANT ENERGY  
7251 AMIGO ST., SUITE 120  
LAS VEGAS, NV 89119

LEILANI JOHNSON KOWAL  
LOS ANGELES DEPT. OF WATER & POWER  
111 NORTH HOPE STREET, SUITE 1536  
LOS ANGELES, CA 90012

DEAN A. KINPORTS  
SAN DIEGO GAS AND ELECTRIC  
555 W. 5TH STREET, GT14D6  
LOS ANGELES, CA 90013

ALANA STEELE  
ATTORNEY AT LAW  
HANNA AND MORTON, LLP  
444 SOUTH FLOWER STREET, SUITE 1500  
LOS ANGELES, CA 90071-2916

ERIC KLINKNER  
PASADENA DEPARTMENT OF WATER AND POWER  
150 SOUTH LOS ROBLES AVENUE, SUITE 200  
PASADENA, CA 91101-2437

STEVE ENDO  
PASADENA DEPARTMENT OF WATER & POWER  
45 EAST GLENARM STREET  
PASADENA, CA 91105

STEVEN G. LINS  
GENERAL COUNSEL  
GLENDALE WATER AND POWER  
613 EAST BROADWAY, SUITE 220  
GLENDALE, CA 91206-4394

CONSTELLATION ENERGY GROUP INC  
550 W. WASHINGTON ST, STE 300  
CHICAGO, IL 60661

GARY A. HINNERS  
RELIANT ENERGY  
1000 MAIN STREET  
HOUSTON, TX 77002

ELENA MELLO  
SIERRA PACIFIC POWER COMPANY  
6100 NEIL ROAD  
RENO, NV 89520

ROBERT L. PETTINATO  
LOS ANGELES DEPARTMENT OF WATER & POWER  
111 NORTH HOPE STREET, SUITE 1151  
LOS ANGELES, CA 90012

RASHA PRINCE  
SAN DIEGO GAS & ELECTRIC  
555 WEST 5TH STREET, GT14D6  
LOS ANGELES, CA 90013

DR. MARK ALLEN BERNSTEIN  
UNIVERSITY OF SOUTHERN CALIFORNIA  
VKC 327 UNIVERSITY PARK CAMPUS  
LOS ANGELES, CA 90089-0044

REN ZHANG  
PASADENA DEPARTMENT OF WATER & POWER  
45 EAST GLENARM STREET  
PASADENA, CA 91105

HALL P. DAILY  
AVP OF GOVERNMENT AND COMMUNITY RELAT.  
CALIFORNIA INSTITUTE OF TECHNOLOGY  
MAIL CODE 2-9  
PASADENA, CA 91125

BRUNO JEIDER  
BURBANK WATER & POWER  
164 WEST MAGNOLIA BLVD.  
BURBANK, CA 91502

RICHARD J. MORILLO  
PO BOX 6459  
BURBANK, CA 91510-6459

MICHAEL D. MONTOYA  
ATTORNEY AT LAW  
SOUTHERN CALIFORNIA EDISON COMPANY  
2244 WALNUT GROVE AVENUE  
ROSEMEAD, CA 91770  
FOR: SOUTHERN CALIFORNIA EDISON COMPANY

DON LIDDELL  
ATTORNEY AT LAW  
DOUGLASS & LIDDELL  
2928 2ND AVENUE  
SAN DIEGO, CA 92103

YVONNE GROSS  
REGULATORY POLICY MANAGER  
SEMPRA ENERGY  
HQ08C  
101 ASH STREET  
SAN DIEGO, CA 92103

KIM KIENER  
504 CATALINA BLVD  
SAN DIEGO, CA 92106

DESPINA NIEHAUS  
SAN DIEGO GAS AND ELECTRIC COMPANY  
8330 CENTURY PARK COURT, CP32H  
SAN DIEGO, CA 92123-1530  
FOR: SAN DIEGO GAS AND ELECTRIC COMPANY

JEFFREY M. GARBER  
GENERAL COUNSEL  
IMPERIAL IRRIGATION DISTRICT  
333 EAST BARIONI BOULEVARD  
IMPERIAL, CA 92251

MICHAEL E. CAMPBELL  
INTERIM GENERAL MANAGER  
IMPERIAL IRRIGATION DISTRICT  
333 EAST BARIONI BOULEVARD  
IMPERIAL, CA 92251

GEORGE DEHART  
CITY OF ANAHEIM  
200 SOUTH ANAHEIM BOULEVARD  
ANAHEIM, CA 92805

STEVEN SCIORTINO  
CITY OF ANAHEIM  
200 SOUTH ANAHEIM BOULEVARD  
ANAHEIM, CA 92805

DIANE I. FELLMAN  
DIRECTOR, REGULATORY AFFAIRS  
FPL ENERGY PROJECT MANAGEMENT, INC.  
234 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102  
FOR: FPL ENERGY PROJECT MANAGEMENT, INC.

AUDREY CHANG  
STAFF SCIENTIST  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104

KAREN TERRANOVA  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, STE 2200  
SAN FRANCISCO, CA 94104

LEAH FLETCHER  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET 20TH FLR  
SAN FRANCISCO, CA 94104  
FOR: NATURAL RESOURCES DEFENSE COUNCIL

NORA SHERIFF  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
120 MONTGOMERY STREET, SUITE 2200  
SAN FRANCISCO, CA 94104

SHERYL CARTER  
NATURAL RESOURCES DEFENSE COUNCIL  
111 SUTTER STREET, 20TH FLOOR  
SAN FRANCISCO, CA 94104  
FOR: NATURAL RESOURCES DEFENSE COUNCIL

FOR: ENERGY PRODUCERS AND USERS  
COALITION, INDICATED PRODUCERS AND  
WESTERN STATES PETROLEUM ASSN.

BIANCA BOWMAN  
RATE CASE COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
77 BEALE STREET, MAIL CODE B9A  
SAN FRANCISCO, CA 94105  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

SUSAN H. MAC CORMAC  
MORRISON & FOERSTER LLP  
425 MARKET STREET  
SAN FRANCISCO, CA 94105

TERRY FRY  
NEXANT INC  
101 SECOND ST. 10TH FLR  
SAN FRANCISCO, CA 94105

VALERIE WINN  
PROJECT MANAGER  
PACIFIC GAS & ELECTRIC  
77 BEALE STREET, B9A  
SAN FRANCISCO, CA 94105

WILLIAM H. CHEN  
DIRECTOR, ENERGY POLICY WEST REGION  
CONSTELLATION NEW ENERGY, INC.  
SPEAR TOWER, 36TH FLOOR  
ONE MARKET STREET  
SAN FRANCISCO, CA 94105

ANNE W. KUYKENDALL  
FOLGER LEVIN & KAHN LLP  
EMBARCADERO CENTER WEST  
275 BATTERY STREET, 23RD FLOOR  
SAN FRANCISCO, CA 94111

JANINE L. SCANCARELLI  
ATTORNEY AT LAW  
FOLGER, LEVIN & KAHN, LLP  
275 BATTERY STREET, 23RD FLOOR  
SAN FRANCISCO, CA 94111

JOSEPH F. WIEDMAN  
ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

MARTIN A. MATTES  
ATTORNEY AT LAW  
NOSSAMAN GUTHNER KNOX & ELLIOTT, LLP  
50 CALIFORNIA STREET, 34TH FLOOR  
SAN FRANCISCO, CA 94111-4799

ANDREW L. HARRIS  
PACIFIC GAS & ELECTRIC COMPANY  
PO BOX 770000 MAIL CODE B9A  
SAN FRANCISCO, CA 94177

ED LUCHA  
CASE COORDINATOR  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 770000, MAIL CODE B9A  
SAN FRANCISCO, CA 94177

KATE BEARDSLEY  
PG&E  
MAILCODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

MEREDITH ALLEN  
PACIFIC GAS AND ELECTRIC  
PO BOX 770000 MAILCODE B10C  
SAN FRANCISCO, CA 94177

SEBASTIAN CSAPO  
PACIFIC GAS AND ELECTRIC COMPANY  
MAIL CODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177

SHAUN HALVERSON

WILLIAM H. BOOTH

PACIFIC GAS AND ELECTRIC COMPANY  
PG&E MAIL CODE B9A  
PO BOX 770000  
SAN FRANCISCO, CA 94177  
FOR: PACIFIC GAS AND ELECTRIC COMPANY

ATTORNEY AT LAW  
LAW OFFICES OF WILLIAM H. BOOTH  
67 CARR DRIVE  
MORAGA, CA 94596  
FOR: CALIFORNIA LARGE ENERGY CONSUMER'S  
ASSOCIATION

ELLEN R. AURITI  
EXEC. DIR., RESEARCH POLICY AND LEGISLAT  
UNIV. OF CALIF. OFFICE OF THE PRESIDENT  
1111 FRANKLIN STREET  
OAKLAND, CA 94607

JODY S. LONDON  
JODY LONDON CONSULTING  
PO BOX 3629  
OAKLAND, CA 94609

MRW & ASSOCIATES, INC.  
1814 FRANKLIN STREET, SUITE 720  
OAKLAND, CA 94612

CLIFF CHEN  
UNION OF CONCERNED SCIENTISTS  
2397 SHATTUCK AVENUE, SUITE 203  
BERKELEY, CA 94704

JESSE W. RASKIN  
LEGAL ASSOCIATE  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, 2ND FLOOR  
BERKELEY, CA 94704  
FOR: THE GREENLINING INSTITUTE

ROBERT GNAIZDA  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVE., 2/F  
BERKELEY, CA 94704  
FOR: THE GREENLINING INSTITUTE

MARCIA W. BECK  
LAWRENCE BERKELEY NATIONAL LABORATORY  
MS 90-90R3027D  
1 CYCLOTRON ROAD  
BERKELEY, CA 94720

KAREN NOTSUND  
ASSISTANT DIRECTOR  
UC ENERGY INSTITUTE  
2547 CHANNING WAY 5180  
BERKELEY, CA 94720-5180

LYNN ALEXANDER  
LMA CONSULTING  
129 REDWOOD AVENUE  
CORTE MADERA, CA 94925

BARRY F. MCCARTHY, ESQ.  
ATTORNEY AT LAW  
MCCARTHY & BARRY LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113

C. SUSIE BERLIN  
ATTORNEY AT LAW  
MC CARTHY & BERLIN, LLP  
100 PARK CENTER PLAZA, SUITE 501  
SAN JOSE, CA 95113

JAMES WEIL  
DIRECTOR  
AGLET CONSUMER ALLIANCE  
PO BOX 37  
COOL, CA 95614

ANDREW BROWN  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95811

ERIK EMBLEM  
3 E INTERNATIONAL INCORPORATED  
1809 S STREET, SUITE 101-207  
SACRAMENTO, CA 95811  
FOR: 3 E INTERNATIONAL INCORPORATED

SUSAN L. FISCHER, PH.D.  
AIR RESOURCES BOARD, RESEARCH DIVISION  
1001 I ST., PO BOX 2815  
SACRAMENTO, CA 95812

BRUCE MCLAUGHLIN  
BRAUN & BLAISING, P.C.  
915 L STREET, SUITE 1270  
SACRAMENTO, CA 95814

CATHY REHEIS-BOYD  
CHIEF OPERATING OFFICER  
WESTERN STATES PETROLEUM ASSOCIATION  
1415 L STREET, SUITE 600  
SACRAMENTO, CA 95814

CHANGUS JONATHAN  
LEGISLATIVE DIRECTOR  
OFFICE OF ASSEMBLY MEMBER BLAKESLEE  
STATE CAPITOL, ROOM 4117  
SACRAMENTO, CA 95814

DOUGLAS K. KERNER  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814

EDWARD RANDOLPH  
ASM LEVINE'S OFFICE  
ASSEMBLY COMMITTEE/UTILITIES AND COMMERC  
STATE CAPITOL ROOM 5135  
SACRAMENTO, CA 95814

JANE E. LUCKHARDT  
ATTORNEY AT LAW  
DOWNEY BRAND LLP  
555 CAPITOL MALL, 10TH FLOOR  
SACRAMENTO, CA 95814

JEFFREY D. HARRIS  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814

MICHELLE GARCIA  
AIR RESOURCES BOARD  
1001 10TH STREET  
SACRAMENTO, CA 95814  
FOR: AIR RESOURCES BOARD

VERONICA VILLALOBOS  
UNIVERSITY OF SOUTHERN CALIFORNIA  
1800 I STREET  
SACRAMENTO, CA 95814

WILLIAM W. WESTERFIELD III  
ELLISON SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814

LYNN M. HAUG  
ATTORNEY AT LAW  
ELLISON, SCHNEIDER & HARRIS, LLP  
2015 H STREET  
SACRAMENTO, CA 95814-3109

ELIZABETH WESTBY  
ATTORNEY AT LAW  
ALCANTAR & KAHL, LLP  
1300 SW FIFTH AVE., SUITE 1750  
PORTLAND, OR 97201

CATHIE ALLEN  
CA STATE MGR.  
PACIFICORP  
825 NE MULTNOMAH STREET, SUITE 2000  
PORTLAND, OR 97232

KYLE L. DAVIS  
PACIFICORP  
825 NE MULTNOMAH ST., 20TH FLOOR  
PORTLAND, OR 97232

## State Service

BETH MOORE  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4103  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CAROL A. BROWN  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5103  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CHRISTINE S. TAM  
CALIF PUBLIC UTILITIES COMMISSION  
ELECTRICITY PLANNING & POLICY BRANCH  
ROOM 4209  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

F. JACKSON STODDARD  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5125  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JACLYN MARKS  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
ROOM 5306  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JANET A. ECONOME  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
ROOM 5116  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SACHU CONSTANTINE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SCOTT MURTISHAW  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY RESOURCES BRANCH  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

CLARE LAUFENBERG  
CALIFORNIA ENERGY COMMISSION  
1516 NINTH STREET, MS 46  
SACRAMENTO, CA 95814